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February 2, 2000

John R. Velasquez, Jr. Acting Central Enforcement Docket Supervisor **Federal Election Commission** 999 E Street, N.W. Washington, D.C. 20463

RE:

MUR 4953

Americans For A Republican Majority

Dear Mr. Velasquez:

This letter responds to the complaint filed with the Commission by the Democratic Congressional Campaign Committee (DCCC) on December 8, 1999. In its complaint, the DCCC makes broad allegations regarding the activities of several organizations and individuals, one of which is Americans For A Republican Majority (ARMPAC).

ARMPAC is a multi-candidate committee which is not connected to or affiliated with any other organization or campaign committee. It has been registered with the FEC since 1994, and has disclosed all of its activity in compliance with the Federal Election Campaign Act of 1974 (FECA), and the rules of the Commission found at 11 CFR.

A careful review of the complaint reveals that ARMPAC is mentioned only twice - once in the first paragraph where the DCCC provides a laundry list of possible suspects; and again on page three of the complaint where the DCCC points out that Jim Ellis is a paid consultant for ARMPAC and that ARMPAC shares office space with Americans for Economic Growth (AEG). Based on these two facts alone, it appears that the DCCC is asking the Commission to find that ARMPAC is affiliated with the NRCC and all the other organizations named in the complaint.

It is true that Mr. Ellis is a paid consultant of ARMPAC whose duties involve fundraising for the PAC, and although ARMPAC does rent office space, it is not at the same location as AEG. With regard to the alleged affiliation of ARMPAC and the other organizations mentioned in the complaint, the following is true:

- 1. ARMPAC has never had, nor ever will have any authority over the NRCC, AEG or RMIC; ARMPAC has never had, nor ever will have control or any authority over the officers or employees of these other organizations;
- 2. ARMPAC does not concern itself with whether its paid consultants have professional arrangements with other organizations as long as any other arrangement does not interfere with the services to be provided to ARMPAC;
- 3. ARMPAC does not receive any funding from these other organizations all of its funds are received through contributions from individuals and other "legal" entities that are properly disclosed in its monthly filings;
- 4. Other than his re-election committee, ARMPAC is unaware of any other organizations Rep. Delay has formed.

The complaint is based, in its entirety, on various press accounts whose validity has not been substantiated by the complainant. Moreover, there is nothing in the complaint that suggests ARMPAC has violated the Federal Elections Campaign Act of 1974 or the rules of the Commission. As such, ARMPAC respectfully requests the Commission take no further action against ARMPAC and dismiss ARMPAC from this MUR.

Thank you for the opportunity to respond.

Sincerely,

Barbara W. Bonfiglio

Savara W. Brytzkia

Cc: Corwin Teltshik
Treasurer, ARMPAC